

The Honorable Brian D. Lynch
Hearing Date: June 10, 2015
Hearing Time: 9:00 a.m.
Response Date: June 3, 2015
Chapter 7
Location: Tacoma

UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF WASHINGTON

In re:

DICKSON MANG JR.,

Debtor.

No. 15-40334

MOTION FOR SALE OF PROPERTY FREE
AND CLEAR OF LIENS

COMES NOW the Trustee, Kathryn A. Ellis, and moves the Court for an order permitting sale of the real property located at 5419 Courtney St SE, Olympia, WA, free and clear of all liens, for the sum of \$225,000.00 to Manpreet Gill, and/or assigns, or to the individual(s) making the highest and best offer to the estate at or before the hearing on this Motion.

The Trustee also seeks authority to pay the first position Deed of Trust of Wells Fargo Bank NA, and/or assigns, in the amount of approximately \$182,500.00, or such sum as may be negotiated or adjusted to accomplish a sale, in full satisfaction of its lien against this property after all costs of closing, including real estate commissions, property taxes, excise taxes, and other closing costs, together with a carveout to the estate in the amount of \$20,000.

Said sale to Manpreet Gill, and/or assigns, will be free and clear of all liens and interests, said liens and interests to attach to the proceeds of the sale as though those proceeds were the property. Notwithstanding the foregoing, the Trustee requests the authority to pay the above named secured creditor in the approximate amount stated.

DATED this 8th day of May, 2015.

/s/ Kathryn A. Ellis

Kathryn A. Ellis, Trustee

C:\Shared\KAE\Dox\TRUSTEE\Mang\sale_mot.wpd

KATHRYN A. ELLIS, ESQ.
600 Stewart St
Suite 1300
Seattle, WA 98101
(206) 682-5002

MOTION FOR SALE OF PROPERTY FREE AND CLEAR OF LIENS - 1